

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

No. 17-20274

Plaintiff,

Hon. Bernard Friedman

v.

D-1 JUMANA NAGARWALA,  
D-2 FAKHRUDDIN ATTAR,  
D-3 FARIDA ATTAR, and  
D-4 FATEMA DAHODWALA,

Defendants.

\_\_\_\_\_ /

**GOVERNMENT’S RESPONSE TO DEFENDANTS’  
MOTION TO SUBMIT REPLY BRIEF IN EXCESS  
OF PAGE LIMIT AND MOTION TO STRIKE REPLY**

Defendants filed a 31-page motion to dismiss the Fourth Superseding Indictment on the grounds of prosecutorial vindictiveness. (ECF No. 487). The government filed an 18-page response opposing the motion. (ECF 491). On June 24, 2021, Defendants’ simultaneously filed a 17-page reply (ECF No. 494) and request for permission to exceed the page limit. (ECF No. 493).

Eastern District of Michigan Local Rule 7.1(d)(3)(A) states that “the text of a brief supporting a motion or response, including footnotes and

signatures, may not exceed 25 pages.” And reply briefs “may not exceed 7 pages.” Local Rule 7.1(d)(3)(B).

The Court should deny Defendants’ motion to exceed the page limit and strike their reply brief. Defendants’ initial motion exceeded the page limit by six pages without permission or justification. The government’s response was 18 pages, and now Defendants have asked for leave to file a reply brief that is essentially the same length as the government’s response. The issues presented in Defendants’ motion are not complex. Their request for an additional 10 pages in their reply is not warranted and should be denied.

Respectfully submitted,

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Acting U.S. Attorney

s/Sara D. Woodward  
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Dated: June 24, 2021

**CERTIFICATE OF SERVICE**

I certify that on June 24, 2021, I electronically filed this motion response for the United States with the Clerk of the United States District Court for the Eastern District of Michigan using the ECF system, which will send notification of such filing to counsel of record.

/s/ Sara Woodward  
AUSA, Eastern District of  
Michigan